

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

IMPOSSIBLE FOODS INC., a Delaware corporation,

Plaintiff/Counter-Defendant

v.

IMPOSSIBLE LLC, a Texas limited liability company, and JOEL RUNYON,

Defendants/Counter-Plaintiffs.

Case No. 5:21-cv-02419-BLF (SVK)

**[PLAINTIFF'S PROPOSED] ORDER ON
JOINT STATEMENT REGARDING
DEFENDANT IMPOSSIBLE LLC'S
NOTICES OF DEPOSITION OF APEX
WITNESSES AND 30(b)(6) TOPICS**

Re: Dkt. No. XX

ORDER

Before the Court is a Joint Statement submitted by Plaintiff Impossible Foods Inc. concerning Defendant Impossible LLC's notice of deposition of an apex witness and Impossible LLC's notice of 30(b)(6) deposition. Having reviewed the Joint Statement and its exhibits, the Court grants Plaintiff's motion to quash because Impossible LLC is unable to identify the witnesses' unique first-hand, non-repetitive knowledge of the facts at issue in the case and has not exhausted other less intrusive discovery methods. The Court further grants Plaintiff's motion as to 30(b)(6) topics because, as written, the topics seek discovery-on-discovery, which is neither relevant to the merits of any claims or defenses nor proportional to the needs of the case.

Accordingly, Plaintiff's motion is hereby GRANTED.

SO ORDERED.

HON. SUSAN VAN KEULEN
United States Magistrate Judge